

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Paul Williams, an individual,

Plaintiff,

v.

Ocean Cape LLC and Dave Olney,

Defendants.

In admiralty and at Law

No. 2:10 cv 01936

COMPLAINT FOR CREW WAGES

I. PARTIES

1.1 Plaintiff Paul Williams is an individual residing in King County Washington at all material times.

1.2 The plaintiff was a crewmember employed aboard the F/V Ocean Cape from on or about April 2009 through June 2009 as a seaman. Pursuant to 28 U.S.C. § 1916, Plaintiff Paul Williams is eligible to institute suit without fees or costs.

1.3 The Ocean Cape LLC is a Washington Corporation and is the owner of the F/V OCEAN CAPE.

1.4 Dave Olney is the owner of Ocean Cape LLC and is the party responsible for paying crew wages.

II. JURISDICTION AND VENUE

1 3.6 As a result of the foregoing, the plaintiff has been damaged in an
2 amount to be proven at trial.

3 **PRAYER FOR RELIEF**

4 WHEREFORE, Plaintiffs pray for the following relief:

- 5 1. Judgment against the defendants jointly and severally, for damages
6 including but not limited to base wages in the amount of highest wage in the port,
7 and double wages as penalty damages under Washington Law;
- 8 2. Attorneys fees and costs;
- 9 3. Any other and additional relief the court deems just and proper.

10 DATED this 30th day of November, 2010.

11 /s/ William Keller

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